## REMARKS

Claims 1-25 remain pending with claims 1 and 17 being independent. Applicants' have amended claim 13 (on page 4 of this amendment).

Independent Claim 1

Claim 1 recites a method that includes "specifying a thread from among a plurality of processing threads to process data" ... "from one of a plurality of device ports". As an example of an application of this subject matter, the description includes an illustrative discussion of the independently operating threads of a network processor that process data received over different ports.

The Examiner rejected claim 1 as being obvious in view of Allison (U.S. 6,373,848) stating:

> "Allison does not explicitly state specifying a thread from among a plurality of processing program threads to process the data. However, Allison teaches specifying instructions from a plurality of instructions to process the data. One of ordinary skill in the art should recognize that a program is construction of plurality of instructions which are organized or grouped into subroutines or threads in accordance with their functions such as interrupt subroutine, word processing subroutine or I/O subroutine." (page 2, office action mailed 03/28/03).

The statement above seems to equate a "thread" with any set of program instructions. This, however, robs the term "thread" of its meaning. In particular, the specification describes different threads as having different execution contexts. For instance, the description describes different threads of instructions as having different program counters. In other words, the terms "subroutine", "instructions", and "thread" are not interchangeable. That is, while a set of instructions may be organized as subroutines or functions, the organization of the instructions is not the issue, the issue is whether the instructions are executed as a thread.

The Examiner states that Allison does not specify the use of threads. Thus, the Examiner seems to be suggesting a modification of Allison's MAC to include a multi-threaded design. However, the Examiner offers no motivation justifying such a modification. Thus, Applicants request withdrawal of the §103 rejection of claim 1 and its dependent claims. For similar reasons, Applicants also request withdrawal of the §103 rejection of claim 17 and its dependent claims.

## Dependent Claim 13

Dependent claim 13 recites a method that includes "determining which among the plurality of program threads is available" and "assigning an available program thread." For example, some threads may be busy performing other tasks and may be unavailable to process the data at a given point in time.

The Examiner' did not identify any portion of Allison describing thread availability nor identify any motivation for modifying Allison to do so. As described above, Allison does not describe using threads much less determining which are available. Thus, Applicants request withdrawal of the §103 rejection of claim 13.

## Conclusion

Applicants' are very eager to advance this case to issuance and invite the Examiner to call Robert Greenberg at 617-413-3198 to discuss the case further.

Applicant : Wolrich, et al.
Serial No. : 09/475,614
Filed     : December 30, 1999
Page      : 9

Attorney's Docket No.: 10559-137001
Intel Docket No.: P7876

No fee is believed to be due at this time; however, if any other fees are due, please apply such fees to Deposit Account No. 06-1050 referencing attorney docket number: 10559-137001.

Respectfully submitted,

Date:____9/29/03_____

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